

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ELAINE McLAUGHLIN,)	
)	
Plaintiff,)	No. 08 C 1830
)	
v.)	Judge Bucklo
)	Magistrate Judge Keys
COUNTY OF COOK, d/b/a COOK)	
COUNTY HIGHWAY DEPARTMENT,)	
)	
Defendant.)	

REPORT OF PARTIES' PLANNING MEETING

Plaintiff Elaine McLaughlin, by and through her attorneys, Barry A. Gomberg and Brian S. Schwartz, Barry A. Gomberg & Associates, Ltd., and Defendant County of Cook, d/b/a Cook County Highway Department, by and through its attorney, Michael D. Jacobs, Office of the State's Attorney of Cook County, hereby submit the Report of the Parties' Planning Meeting.

1. Pursuant FED. R. Civ. P. 26(f), a meeting was held via telephone on May 13, 2008 and was attended by:

Brian S. Schwartz, one of the attorneys for Plaintiff; and

Michael D. Jacobs, attorney for Defendant.

2. The parties jointly propose to the Court the following discovery schedule:

a. Discovery will be needed on the following subjects:

i. liability;

ii. damages;

iii. defenses to liability offered by Defendant.

- b. Rule 26(a)(1) disclosures to be made by May 30, 2008. All discovery to be commenced in time to be completed by November 14, 2008.
 - c. The parties expect that 10-15 depositions will be taken (inclusive of both parties taking depositions).
 - d. Reports from retained experts under Rule 26(a)(2) due:
 - i. from Plaintiff by September 1, 2008;
 - ii. from Defendant by October 7, 2008.
 - e. Dispositive motions to be filed 30 days from the close of discovery.
 - f. Final Pretrial Order to be filed 30 days from the Court ruling on dispositive motions.
 - g. The case will be ready for trial on a date that the Court deems appropriate and is expected to last 3-5 days.
3. Pursuant to the Court's standing order, the parties are exploring the possibility of settlement.
4. The parties do not consent to proceed before a Magistrate Judge at this time.

Respectfully submitted,

By:

By:

s/ Brian S. Schwartz

s/ Michael D. Jacobs

Barry A. Gomberg
Brian S. Schwartz
Barry A. Gomberg & Associates. Ltd.
53 W. Jackson Blvd., Suite 1350
Chicago, IL 60604
(312) 922-0550

Michael D. Jacobs
Assistant State's Attorney
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-3401

CERTIFICATE OF SERVICE

To: Michael D. Jacobs
Assistant State's Attorney
500 Richard J. Daley Center
Chicago, Illinois 60602

I, Brian S. Schwartz, certify that I caused a true and correct copy of the attached Report of the Parties' Planning meeting to be served on the above-named counsel of record via CM/ECF filing and regular mail on May 14, 2008.

s/ Brian S. Schwartz